

MCIWORLDCOM



0000020822

Western Public Policy
707 17th Street, Suite 3600
Denver, CO 80202
888 475 7218
Fax 303 390 6333

RECEIVED

2001 AUG 20 A 11: 24

AZ CORP COMMISSION
DOCUMENT CONTROL

August 17, 2001

Arizona Corporation Commission
Docket Control
1200 W. Washington Street
Phoenix, AZ 85007

Arizona Corporation Commission
DOCKETED

AUG 20 2001

re: T-000000B-97-0238

DOCKETED BY	<i>nc</i>
-------------	-----------

To Whom It May Concern:

Enclosed are an original and fifteen (15) copies of Brooks Fiber Communications of Tucson, Inc's Response to Arizona Corporation Commission Staff's First Set of Data Requests and **Metropolitan Fiber Systems of Arizona, Inc's Response to Arizona** Corporate Commission Staff's First Set of Data Requests, in the above-mentioned document, for filing with the Arizona Corporation Commission. I am also enclosing one copy with a self-addressed envelope. Please stamp this copy and return it to me in the envelope provided.

Also, there is a confidential attachment for Response 10 in the Brooks Fiber filing. This attachment is being sent directly to the Legal Department, should you need it.

Thank you.

If you have any questions, please do not hesitate to call me at (303) 390-1197.

Sincerely,

John Connors

Attachments

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

2001 AUG 20 A 11:20

AZ CORP COMMISSION
DOCUMENT CONTROL

WILLIAM A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF
1996.

DOCKET NO. T-00000B-97-0238

**METROPOLITAN FIBER SYSTEMS OF
ARIZONA, INC. 'S RESPONSE TO
ARIZONA CORPORATE COMMISSION
STAFF'S FIRST SET OF DATA
REQUESTS**

Metropolitan Fiber Systems of Arizona, Inc. ("MFS") submits the following objections and responses to the First Set of Data Requests upon MFS served by Arizona Corporation Commission Staff ("Staff").

OBJECTIONS

MFS objects to Staff's Definitions, Instructions and Discovery Requests on the grounds that they are unreasonably burdensome, vague, ambiguous, and seek disclosure of highly sensitive, confidential information. These objections are incorporated into each further response set forth below.

DATA REQUESTS

1. Are you providing **facilities-based** local exchange service to residential customers within **Qwest's service territory** in the State of Arizona?

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: No

Source: Susan Travis, WorldCom, Inc. 707 17th Street, Suite 3600, Denver, CO. 70202

Preparer: Teresa Tan, WorldCom, Inc., 201 Spear Street, 9th Fl., San Francisco, CA. 94105

2. Please identify the number of residential access lines you serve via facilities-based competition within Qwest's service territory in the State of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: 0

3. Please identify the number of residential access lines you serve within Qwest's service territory in the State of Arizona via facilities owned by you.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: 0

4. Please identify the number of residential access lines you serve via **UNEs, UNE-P, and/or UNE Combinations** within Qwest's service territory in the State of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: 0

5. Please identify the number of residential access lines you serve via **resale** within Qwest's service territory in the State of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: 0

6. Please identify the number of residential customers you service via facilities-based competition within Qwest's service territory in the State of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS Responds as follows: 0

7. Please identify the number of residential customers you serve within Qwest's service territory in the State of Arizona via facilities owned by you.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: **0**

8. Please identify the number of residential customers you serve via **UNEs, UNE-P, and/or UNE Combinations** within Qwest's service territory in the State of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: **0**

9. Please identify the number of residential customers you serve via **resale** within Qwest's service territory in the State of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: **0**

10. Are you providing **facilities-based** local exchange service to business customers within **Qwest's service territory** in the state of Arizona?

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: No

11. Please identify the number of business access lines you serve via facilities-based competition within Qwest's service territory in the state of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: **0**

12. Please identify the number of business access lines you serve within Qwest's service territory in the state of Arizona via facilities owned by you.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: **0**

13. Please identify the number of business access lines you via **UNEs, UNE-P, and/or UNE Combinations** within Qwest's service territory in the state of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: **0**

14. Please identify the number of business access lines you serve via **resale** within Qwest's service territory in the state of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: 0

15. Please identify the number of business customers you serve via facilities-based competition within Qwest's service territory in the state of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: 0

16. Please identify the number of business customers you serve within Qwest's service territory in the state of Arizona via facilities owned by you.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: 0

17. Please identify the number of business customers you serve via **UNEs, UNE-P, and/or UNE Combinations** within Qwest's service territory in the state of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: 0

18. Please identify the number of business customers you serve via **resale** within Qwest's service territory in the state of Arizona.

MFS's Response: Subject to and without waiving its objections, MFS responds as follows: 0

DATED this 17th day of August, 2001.

WORLDCOM, INC.

By

TERESA TAN

(BY
J.C.)

Teresa Tan
Senior Attorney
201 Spear St., 9th Fl.
San Francisco, CA 94105
(415) 228-1445

ORIGINAL and 15 copies of the foregoing document filed this 18th day of August 2001 with:

Docket Control
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007
REDACTED VERSION

COPY of the foregoing document emailed and mailed, via overnight express mail, this 18th day of August 2001, to:

Maureen A. Scott
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007
maureenscott@cc.state.az.us
UNREDACTED-CONFIDENTIAL VERSION
(via email only)

Deborah Scott, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007
dscott@cc.state.az.us
UNREDACTED-CONFIDENTIAL VERSION
(via email and overnight mail)

Jerry Rudibaugh, Chief Hearing Officer
Hearing Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington
Phoenix, AZ 85007
jlr@util.cc.state.az.us
UNREDACTED-CONFIDENTIAL VERSION
(via email and overnight mail)

Jane Rodda, Chief Administrative Law Judge
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007
jrodda@cc.state.az.us
UNREDACTED-CONFIDENTIAL VERSION
(via email and overnight mail)

Matthew Rowell
Chief of Economics & Research
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007
mrowell@cc.state.az.us

UNREDACTED-CONFIDENTIAL VERSION
(via email and overnight delivery)

Caroline A Butler, Paralegal
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007
cab@cc.state.az.us

UNREDACTED-CONFIDENTIAL VERSION
(via email and overnight delivery)

**COPY of the foregoing document mailed,
unless otherwise indicated,
this 18th day of August 2001, to:**

Steven H. Kukta
Sprint Communications Company, LP
1850 Gateway Drive, 7th floor
San Mateo, CA 94404-2567
UNREDACTED-PROPRIETARY VERSION

Thomas Campbell
Lewis & Roca
40 N. Central Ave.
Phoenix, AZ 85004
UNREDACTED-PROPRIETARY VERSION

Joan S. Burke
Osborn Maledon, P.A.
2929 N. Central Ave., 21st Floor
PO Box 36379
Phoenix, AZ 85067-6379
UNREDACTED-PROPRIETARY VERSION

Thomas F. Dixon
WorldCom
707 17th Street # 4200
Denver, CO 80202
thomas.f.dixon@wcom.com
UNREDACTED-PROPRIETARY VERSION
(via email and hand delivery)

Scott S. Wakefield
Jessica Carpenter
Residential Utility Consumer Office
2828 North Central Ave., Suite 1200
Phoenix, AZ 85004
UNREDACTED-PROPIETARY VERSION

Michael M. Grant
Gallagher & Kennedy
2600 N. Central Ave.
Phoenix, AZ 85004-3020
UNREDACTED-PROPRIETARY VERSION

Michael Patten
Brown & Bain
2901 N. Central Ave.
Phoenix, AZ 85012
UNREDACTED PROPRIETARY VERSION

Bradley Carroll, Esq.
Cox Arizona Telcom, LLC
1550 West Deer Valley Rd.
Phoenix, AZ 85027
UNREDACTED PROPRIETARY VERSION

Mark Trierweiler
Vice President – Government Affairs
AT&T Communications of the Mountain States
111 West Monroe, Suite 1201
Phoenix, AZ 85003
REDACTED VERSION

Daniel Waggoner
Davis, Wright & Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688
REDACTED VERSION

Richard S. Wolters
Maria Arias-Chapleau
AT&T Law Department
1875 Lawrence Street # 1575
Denver, CO 80202
UNREDACTED-PROPRIETARY VERSION

Timothy Berg
Fennemore, Craig, P.C.
3003 N. Central Avenue
Suite 2600
Phoenix, AZ 85012-3913
UNREDACTED-PROPRIETARY VERSION

Charles Steese
John Munn
US West, Inc.
1801 California Street
Suite 5100
Denver, CO 80202
csteese@uswest.com
jmunnn@uswest.com
UNREDACTED-PROPRIETARY VERSION
(via email and US Mail)

Richard M. Rindler
Morton J. Posner
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 2007-5116
REDACTED VERSION

Mary Tee
Electric Lightwave
PO Box 8905
Vancouver, WA 98668-8905
REDACTED VERSION

Mark P. Trinchero
Davis Wright Tremaine, LLP
1300 S.W. Fifth Avenue
Suite 2300
Portland, OR 97201
REDACTED VERSION

Penny Bewick
New Edge Networks, Inc.
PO Box 5159
Vancouver, WA 98668
REDACTED VERSION

M. Andrew Andrade
5261 S. Quebec Street, Suite 150
Greenwood Village, CO 80111
REDACTED VERSION

Maureen Arnold
US West Communications, Inc.
3033 N. Third Street, Room 1010
Phoenix, AZ 85012
REDACTED VERSION

Alaine Miller
NEXTLINK Communications, Inc.
500 108th Ave. NE, Suite 2200
Bellevue, WA 98004
REDACTED VERSION

Diane Bacon, Legislative Director
Communications Workers of America
5818 N. 7th St., Suite 206
Phoenix, Arizona 85014-5811
REDACTED VERSION

Philip A. Doherty
545 South Prospect Street, Suite 22
Burlington, VT 05401
rhip@bellatlantic.net
REDACTED VERSION
(via email only)

Joyce Hundley
U.S. Dept. of Justice
Antitrust Division
1401 H Street, NW, # 8000
Washington, DC 20530
UNREDACTED-PROPRIETARY VERSION

Andrew O. Isar
Telecommunications Resellers Association
4312 92nd Ave., NW
Gig Harbor, WA 98335
REDACTED VERSION

Raymond S. Heyman
Randall H. Warner
Two Arizona Center
400 North 5th Street, Suite 1000
Phoenix, AZ 85004-3906
REDACTED VERSION

Douglas Hsiao
Rhythms Links, Inc.
6933 Revere Parkway
Englewood, CO 80112
REDACTED VERSION

Mark Dioguardi
Tiffany and Bosco, PA
500 Dial Tower
1850 N. Central Avenue
Phoenix, AZ 85004
REDACTED VERSION

Thomas L. Mumaw
Snell & Wilmer
One Arizona Center
Phoenix, AZ 85005-0001
REDACTED VERSION

Charles Kallenbach
American Communications Services, Inc.
131 National Business Parkway
Annapolis Junction, Maryland
REDACTED VERSION

Patricia Van Midde
Assistant Vice President
AT&T
111 West Monroe, Suite 1201
Phoenix, AZ 85003
REDACTED VERSION

Gena Doyscher
Global Crossing Services, Inc.
1221 Nicollet Mall
Minneapolis, MN 55403-2420
REDACTED VERSION

Karen L. Clauson
Eschelon Telecom, Inc.
730 Second Avenue South, Suite 1200
Minneapolis, MN 55402
REDACTED VERSION

Mark N. Rogers
Excell Agent Services, LLC
2175 W. 14th Street
Tempe, AZ 85281
REDACTED VERSION

Richard Sampson
Z-Tel Communications, Inc.
601 S. Harbor Island Blvd.
Tampa, FL 33602
REDACTED VERSION

Jonathan E. Curtis
Michael B. Hazzard
Kelly Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036
REDACTED VERSION

Lindall Nipps
Allegiance Telecom, Inc.
845 Camino Sur
Palm Springs, CA 92262
REDACTED VERSION

Andrea P. Harris
Sr. Manager, Reg.
Allegiance Telecom, Inc.
PO Box 2610
Dublin, CA 94568
REDACTED VERSION

Gary L. Lane, Esq.
6902 East 1st Street, Suite 201
Scottsdale, AZ 85251
REDACTED VERSION



JOHN CONNORS